

# EXHIBIT F

**Ceisler, Daniel**

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**From:** Dave Brown <Dave.Brown@northwestlaw.ca>  
**Sent:** Friday, February 24, 2023 4:02 PM  
**To:** Ceisler, Daniel  
**Cc:** Zimmerman, Robert; Guevara, Camila  
**Subject:** Fw: P320 Statements

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Hi Daniel:

Here is the email I received from Sig after a television interview on City News in Canada.

While tempted, I did not reply.

Dave Brown

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**From:** Steven Shawver <Steven.Shawver@sigsauer.com>  
**Sent:** January 27, 2023 2:00 PM  
**To:** Dave Brown <Dave.Brown@northwestlaw.ca>  
**Cc:** Dave Jones <Dave.Jones@sigsauer.com>  
**Subject:** P320 Statements

Dear Mr. Brown,

An article posted by City News Everywhere titled “Safety concerns surrounding RCMP’s potential purchase of the Sig P320 pistol” written by Mr. Alex Karpa and dated Jan 24, 2023, quoted you extensively. In a conclusory fashion you state “I think there is a problem with that Sig.” After reviewing the balance of your statements in the article this conclusion is not based on fact or engineering or scientific analysis – it simply is an unsupported conclusion based on random observations that are either incorrect, irrelevant, or misunderstood.

As you are doubtless aware, the P320 is among the most tested and thoroughly vetted pistols in small arms history. The pistol’s design has been reviewed by military and civilian experts and validated through the expenditure of millions of rounds in testing. Your conclusion stands against a significant weight of evidence establishing the gun’s accuracy, reliability, and safety pedigree.

Despite the pistol’s adoption by the military and its significant capture of market share in both law enforcement and civilian markets, there are detractors that seek to capitalize on the P320’s broad market success by attempting to falsely establish that there are defects with the pistol that cause it to discharge without a trigger pull.

As you may be aware Sig has filed suit against an attorney that alleges the P320 is faulty. This suit alleges defamation - that an animation of the operation of the P320 that the attorney had created falsely depicts the angles, geometry, and shape of the internal components of the P320 in order to create the false impression that it can discharge without a trigger pull. You may also be aware that an opinion by an expert sponsoring this theory has been rejected as a matter of law on the basis the expert was unqualified and his methodology was unreliable by a Federal court, and that the only trial conducted under this theory to date resulted in a unanimous jury finding for Sig on all counts. In summary no one has ever replicated these alleged discharges, and no one has presented a plausible theory as to how they might happen.

The support for your conclusion expressed by your quotations is faulty. By way of a few examples:

You cite the manual safety on the US military pistol, and then proceed to conflate that manual safety with a completely different firearm feature known in industry as a tab trigger. As a firearms expert would know, the tab trigger is a design feature employed to enhance drop safety in pistols. A bit of research would have revealed that none of the pending cases allege a drop defect in the P320 pistol, rendering the tab trigger irrelevant to this analysis. Moreover, the modest effort of a trip to Sig's website would reveal that the P320 is offered both with and without a manual safety, so that a customer has the option of selecting their striker fired pistol in the standard non-manual safety configuration or with an external frame manual safety. In the majority of cases police agencies specify or customers select the non-manual safety model.

You then complain that the contract is expected "to go to the lowest bidder." First, there is fault in the logic that claims the price of the pistol is somehow indicative of its safety. Second, while there is some variation, the P320 pistol typically sells at or above the price of its competitors. Lastly, as I'm sure you are aware, Government procurements typically require that a product meet a specification, and once the specification is met the Government is required to select either the low cost or best value.

Lastly, as a firearms safety/training specialist, you know that the vast majority of unintended discharges are attributable to unsafe handling practices, yet you point to 20 lawsuits as support for your conclusion that the P320 is unsafe. As you likely know, lawsuit allegations are not fact. While discovery in these cases is ongoing, it is not uncommon to discover evidence of unsafe handling practices that violate firearms safe handling rules. With more than 2.3 million P320 pistols in the marketplace, some level of unsafe handling can be expected – people get careless and make mistakes. Even if all the "more than 100" cases you cite in your quote were P320 discharges (a figure that is incorrect – for example not all cases cited were a P320), with more than 2.3 million P320's sold the incidence of discharge is 5 places to the right of the decimal point. Given the large number of pistols in the marketplace it would reasonably seem that incidences of unsafe handling would exceed this calculation.

As the article proclaims you to be a gun expert, we would encourage you to perform an analysis that justifies that accolade. What was presented in the article falls regrettably short, unfairly

creating doubt about a defensive sidearm that is thoroughly vetted and trusted by the US military, other worldwide military and law enforcement officers, and law-abiding civilians. If you care to form an informed and supportable conclusion, Dave Jones at [dave.jones@sigsauer.com](mailto:dave.jones@sigsauer.com) can walk you through the science, engineering, and safety features associated with this pistol, providing facts that will allow you to correct your misstatements.

There is much more relevant to mention that space does not allow. I thank you for your thoughtful consideration and hope you will choose to seek the truth.

## **Steven Shawver**

*Executive Vice President & Chief Legal Officer*  
[steven.shawver@sigsauer.com](mailto:steven.shawver@sigsauer.com)



72 Pease Boulevard  
Newington, NH 03801  
USA

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